

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

FILED BY [Signature]
00 DEC 15 AM 10:41
CLARENCE DIST. CT.
CLERK - MIAMI
S.D. CT. - MIAMI
D.C.

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida, and travel to Foxwood Resort, Foxwood, Connecticut, and for grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a fifty thousand dollar corporate surety and a fifty thousand dollar personal surety bond with supervised release.
2. That the Defendant, JULIUS BRUCE CHIUSANO, is also released on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-HUCK.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to Foxwood Resort, Foxwood, Connecticut for the New Year Holiday and to visit family.
5. That the Defendant desires to travel outside of the State of Florida for approximately five (5) days beginning on or about December 29, 2000 and returning January 2, 2001.
6. That the Defendant will check-in with Rauol Segaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release

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immediately upon his return to the jurisdiction.

7. That undersigned has attempted to contact the Pretrial Services officer, Rauol Segaro, regarding this travel permit and as of the filing of this motion, undersigned has not received a response from Mr. Segaro.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and U.S. Mail Delivery; and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 12th DECEMBER, 2000.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341